

The Honorable Ricardo Martinez

UNITED STATES DISTRICT COURT
OF WASHINGTON
AT SEATTLE

JULIE DALESSIO, an individual,

Plaintiff,

v.

UNIVERSITY OF WASHINGTON,

Defendant.

No. 2:17-cv-00642-RSM

DECLARATION OF ALISON
SWENSON IN SUPPORT OF
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT

I, Alison Swenson, declare as follows:

1. I am over the age of 18, and am otherwise competent to testify as to all matters herein, and make the following statements based on my own personal knowledge.

2. I am employed as a Compliance Analyst in the Office of Public Records and Open Public Meetings at the University of Washington. I have worked in this position since July 9, 2014.

3. During my first year as a Compliance Analyst, my work was quality reviewed by my supervisor, Perry Tapper, the senior Public Records Compliance Officer with 10 years of experience. We spent roughly 5 hours per week reviewing my work and discussing any questions or concerns that I had. Mr. Tapper continues to provide on-going guidance as well. Additionally, the Director and Public Records Officer spent approximately 8 -10 hours during my first several weeks reviewing the Public Records Act exemptions with me. Since July 2014, I have received consistent on the job training and

**DECLARATION of Alison Swenson In Support of
Defendant's Motion for Summary Judgment - 1**
2:17-cv-00642-RSM

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1 have completed multiple additional trainings including Open Public Records Act Training
2 with the Attorney General's Office, HIPAA training by the University of Washington,
3 Statewide Public Records Officers Training by the Attorney General's Office, and Law
4 Enforcement Information and Records Association (LEIRA) Advanced Public Disclosure
5 Training. I also attended the Washington Association of Public Records Officers
6 (WAPRO) Fall Conference in 2015 and 2016 where I received additional continuing
7 education. The Office of Public Records received approximately 817 requests for public
8 records pursuant to RCW Ch. 42.56 and had a workload totaling 5,712,196 pages to be
9 reviewed in 2015. I personally worked on approximately 194 PRA requests in 2015

10 4. On September 16, 2015, an individual named David Betz submitted a public
11 records request to the University's Office of Public Records via email. Prior to receiving
12 Mr. Betz's Public Records Request, I did not know who Julie Dalessio was and, to my
13 knowledge, I had never met or spoken to her. I also did not know who Mr. Betz was, and I
14 still do not know him.

15 5. Upon receiving this request, I followed the usual procedures for locating
16 responsive records, which included contacting the departments that are the custodians of the
17 requested records. Those departments then search for and compile the responsive records
18 and submit copies of those documents to the Office of Public Records for review and
19 release.

20 6. I received 471 pages of responsive records. Of those, 370 pages produced to
21 Mr. Betz were either wholly released or released with permissibly exempt information
22 redacted under RCW Ch. 42.56. I created an exemption log regarding 101 pages determined
23 to be wholly exempt from disclosure under the Public Records Act and were withheld from
24 Mr. Betz.

25 7. I did not add, remove, or alter any documents from Plaintiff's personnel file,
26 and I am not aware of anyone else who added, removed, or altered Plaintiff's personnel file.

27 8. Subsequently, Ms. Dalessio submitted three separate requests for documents

1 and/or information.

2 9. The following are exhibits cited or relied upon in Defendant's Motion for
3 Summary Judgment of which I have personal knowledge:

4 A. Attached as **Exhibit A** is a true and correct copy of documents produced
5 in response to PRR 15-00570. The location of the number that was
6 allowably released in 2015 appears on page 113, and has been "re-
7 redacted" for this court filing.

8 B. Attached as **Exhibit B** is a true and correct copy I received as part of the
9 Human Resources personnel file of the 2003 Settlement Agreement
10 between the University of Washington and Plaintiff.

11 C. Attached as **Exhibit C** is a true and correct copy of David Betz Public
12 Records Request on September 16, 2015 (PRR 15-00570).

13 D. Attached as **Exhibit D** is a true and correct copy of the first release letter
14 for PRR 15-00570.

15 E. Attached as **Exhibit E** is a true and correct copy of the second release
16 letter for PRR 15-00570.

17 F. Attached as **Exhibit F** is a true and correct copy of the Request
18 Summary Report for PR 15-00570.

19 G. Attached as **Exhibit G** is a true and correct copy of Plaintiff's Public
20 Records Request dated March 25, 2016, and the corresponding response
21 letter.

22 H. Attached as **Exhibit H** is a true and correct copy of Plaintiff's Public
23 Records Request dated April 16, 2016, the corresponding release letter,
24 and PRR 16-00283.

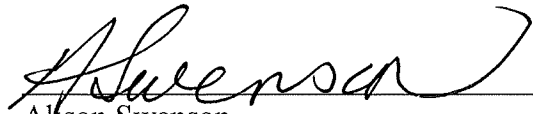
25 I declare under penalty of perjury under the laws of the State of Washington that the
26 foregoing is true and correct to the best of my knowledge.

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DECLARATION of Alison Swenson In Support of
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2:17-cv-00642-RSM

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1 DATED this 21st day of August, 2017, at Seattle, Washington.

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3 Alison Swenson
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**DECLARATION of Alison Swenson In Support of
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2:17-cv-00642-RSM

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